United States District Court
District of New Hampshire

RANDY SMITH
_____
Plaintiff

v.

DETECTIVE: Clark Gaphardt
_____
(Official Capacity)
Defendant(s)

Civil Action No. __14-fp-430__
(To be provided by Clerk's Office)

2014 OCT -6 P 1:42

TO BE COMPLETED BY PLAINTIFF
(Check One Only)
(✓) DEMAND FOR JURY TRIAL
(___) NO JURY TRIAL DEMAND

COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C § 1983

I.   Parties

A. Please provide the following information for each plaintiff:

1. Name ___SMITH_____ ___RANDY_____ _____
   (Last)   (First)   (Initial)

2. Place of Detention __Hillsborough County Dept of Correction__

3. Institutional Address __445 Willow ST__
   __Manchester, N.H. 03103__

4. Are you incarcerated pursuant to a pretrial detention order or are you a sentenced inmate?

   ☐ Pretrial Detention Order
   ☐ Sentenced Inmate

5. Date pretrial detention order was issued or sentence imposed __OCT, 2 2014__

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B. Please provide the full name, current title and address known for each defendant:

1. Name ___GAPHARDT_____ ___CLARK_____ _____
          (Last)   (First)   (Initial)

2. Title __DETECTIVE for CITY of NASHUA, New HAMPSHIRE__

3. Address _____PANTHER LANE_____
NASHUA, NEW HAMPSHIRE, 03060_____

(If the complaint is being made against more than one defendant, please attach additional sheets listing the above information and allegations as follows.)

II.   Statement of Claim

For each claim, please include the following information on attached sheets:

1. State which of your federal constitutional or federal statutory rights have been violated.

2. State which defendant(s) have violated that particular right for each allegation.

3. State, with specificity, the facts and circumstances that gave rise to the violations or deprivations alleged.

4. State the harm or damage that resulted from the alleged violation or deprivation.

Allegation 1: ___Color of Law_____

Supporting *Facts*: HE INTENTIONLY ENGAGED IN dECEIT, dIS honesty fRAUd to ACHIEVE RESULTS by MEAN tHAT VIOLATE THE RULES of PROfESSIONAL CONdUCT, by dISSEMINATING PLAINTIFF PAPERWORK THAT DID NOT bELONG to PLAINTIFF SEE ExhIbITS, 1,2, (1) beING, VAN KURAN, KATHLEEO, M. exhib (2) RANDY SMITH JACKSON. FBI NUMBER OR PUR=CFBI 159623 RA9 Rules 638.1 fORGERY, Rule 641.1 PURJURY.

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Allegation 2: __Color of Law and Forgery 638.1__

Supporting *Facts*: I suffer in fear every day because theres no one out there to protect my family and I do know at any time my family could be taking away from me because the Detective Gearhardt dont care at all about my Constitutional Rights or my family safety.

Allegation 3: __Color of law__

Supporting Facts: I am un able to sleep at night or eat knowing that this "protective" information is in the hand of so many peopled that can destroy my family and me because of this treating violation of law. Fraudulent handling of recordable writing. A person is guilty of a class B felony if it deceive others

(If more space is needed to explain any allegation or to list additional facts, attach additional pages)

III.   Relief Compensational and Punitive damages of $3,000,000 00/00

You must request specific relief in your Complaint. State briefly exactly what you want the court to do for you (attach additional pages if necessary):

The Plaintiff Randy Smith, is suffering the loss of person property and his loss of freedom thru the abuse of the color of law and forgery to compensational and punitive damages Plaintiff seek $3,000,000 00/00

Date: __Oct 2-2014__

__Randy Smith__
Signature of Plaintiff

State of New Hampshire   ]

County of **HILLSBOROUGH**   ]   ss

    ]

___**RANDY SMITH**_____, being first duly sworn, upon oath, presents that (s)he has read and subscribed to the foregoing complaint, and states that the information contained therein is true and correct.

Subscribed and sworn before me this _____ day of _____, 20____..

_____

Notary Public/Justice of the Peace

O R

    I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT.

___Oct 2. 2014_____   ___Randy Smith_____

       DATE   SIGNATURE

JURY TRIAL DEMAND

I demand a jury trial for all claims for which a jury trial is allowed.

YES (X)   NO (__)

(check one only)

Date: ___Oct-2-2014___   ___Randy Smith_____

                                       Signature of Plaintiff

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